

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GLD PARTNERS, L.P. and GLD SPONSOR)	
MEMBER LLC,)	No. 1:23-cv-01266-RGA
)	
Plaintiffs,)	
)	
v.)	
)	
SAGALIAM ACQUISITION CORP.,)	
)	
Defendant.)	
)	

DECLARATION OF H. PETER HAVELES, JR.

I, H. Peter Haveles, Jr., pursuant to 28 U.S.C. § 1746, state as follows:

1. I am a attorney for plaintiffs GLD Partners, L.P. and GLD Sponsor LLC. I am admitted to practice before the Courts of the State of New York, and I am admitted to practice before this Court in this action *pro hac vice*. I have personal knowledge of the facts set forth herein. I submit this declaration in support of plaintiffs' opposition to defendant's Motion for Partial Dismissal of the Amended Complaint.

2. Annexed hereto as Exhibit A is a true and correct copy of the company information page on Edgar for defendant Sagaliam Acquisition Corp. ("Sagaliam"). That page shows that, among other things, Sagaliam filed a Form 8-K on December 11, 2023 and an Amended Form 8-K on December 12, 2023 (which amended the Form 8-K that Sagaliam filed the day before on December 11, 2023).

3. Annexed hereto as Exhibit B is a true and correct copy of the Amended Form 8-K/A along with the Sagaliam press release that Sagaliam submitted as an exhibit to Sagaliam's

Form 8-K. The Form 8-K can be found at www.sec.gov/Archives/edgar/data/1855351/000149315223044465/Form8-ka.htm.

4. The December Form 8-K discloses that Sagaliam received a delisting notification letter from the Listing Qualifications Staff of the Nasdaq Stock Market LLC (“Nasdaq”) on December 5, 2023. The press release describes the contents of the Nasdaq letter, which makes reference to (i) several of the omissions identified in the Amended Complaint regarding the Enzolytics business combination agreement; (ii) Sagaliam’s failure to obtain the required shareholders approvals pursuant to Sagaliam’s corporate charter and Nasdaq rules and (iii) Sagaliam’s failure to comply with various Nasdaq rules.

5. Plaintiffs had no knowledge of the December 5 Nasdaq letter prior to hearing before the Court on December 11, 2023 regarding plaintiff’s motion for a preliminary injunction. As a result of my monitoring the Edgar company page for Sagaliam throughout the day of December 11, I discovered that Sagaliam concealed this information from plaintiffs and the Court and did not disclose the December 5 Nasdaq letter until several hours after the completion of the Court’s December 11 hearing on the motion for a preliminary injunction.

I declare the foregoing statements to be true under the penalty of perjury.

Dated: February 16, 2024

/s/ H. Peter Haveles, Jr.
H. PETER HAVELES, JR.